

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JEROME HODSON,	)	CASE NO.: 1:07-cv-2085
	)	
Plaintiff,	)	JUDGE: O'MALLEY.
	)	
vs.	)	
	)	<b><u>JOINT POSITION STATEMENT</u></b>
JAVITCH, BLOCK, & RATHBONE	)	<b><u>REGARDING AGENDA FOR</u></b>
LLP,	)	<b><u>CASE MANAGEMENT</u></b>
	)	<b><u>CONFERENCE</u></b>
Defendant.	)	

Now comes Plaintiff, Jerome Hodson, by and through undersigned counsel, and Defendant, Javitch, Block, & Rathbone, by and through undersigned counsel, and pursuant to Local Rule 16.3, hereby jointly submit the following statement of its position regarding the agenda for the Case Management Conference to be held on January 7, 2008.

1. The case should be assigned to the following track: **Standard**.
2. This case **is not** suitable for one or more of the following ADR mechanisms.
3. The parties **do not** consent to the jurisdiction of the United States Magistrate Judge pursuant to 28 USC § 636(c).
4. The parties **have** exchanged their Rule 26 initial disclosures prior to the date of the conference.
5. Recommended discovery plan:
  - a. Defendant anticipates conducting general discovery regarding the circumstances surrounding Plaintiff's use and acceptance of the underlying credit card obligation; the civil litigation that took place regarding the said credit card; and Plaintiff's claim for real damages.  
  
Plaintiff anticipates conducting general discovery regarding the civil litigation that took place surrounding the said credit card, and the procedures, methods and criteria surrounding Defendant's selection of venue.
6. The parties request that discovery cutoff date be set on: April 25, 2008

7. The parties shall exchange Expert Reports on or before: February 22, 2008, and Expert Discovery shall be completed on or before March 25, 2008.
8. The parties request that new parties be joined and the pleadings be amended on: January 21, 2008.
9. The parties request that the dispositive motion cutoff date be set on May 23, 2008.
10. The parties request that the Status Hearing be held on May 9, 2008.

Respectfully Submitted:

/s/ Blake Owen Brewer  
Blake Owen Brewer (0010639)  
Blake Owen Brewer Co., L.P.A.  
4807 Rockside Road, Ste. 400  
Independence, OH 44131  
Ph: (216) 642-8234  
Fax: (216) 642-8235  
Email: [blake@blakebrewerlaw.com](mailto:blake@blakebrewerlaw.com)  
*Attorney for Plaintiff*

/s/ R. Glenn Knirsch  
R. Glenn Knirsch (0080770)  
Javitch, Block, & Rathbone, LLP  
1100 Superior Ave., 19<sup>th</sup> Floor  
Cleveland, Ohio 44114  
Ph: (216) 623-0000 ex. 3088  
Fax: (216) 525-4962  
E-mail: [GKnirsch@JBandR.com](mailto:GKnirsch@JBandR.com)  
*Attorney for Defendant*